



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604**

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Pin Oak Energy Partners (Pin Oak) – Clark Well Pad, Valley, Ohio

**FROM:** Veronica Fischer, Environmental Engineer  
AECAB (MI/WI)

**THRU:** Sarah Marshall, Section Supervisor  
AECAB (MI/WI)

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** Pin Oak Energy Partners (Pin Oak) – Clark Well Pad

**Facility Location:** 39.916229, -81.610513 (Valley, Ohio)

**Date of Inspection:** August 30, 2022

**EPA Inspector(s):**

1. Veronica Fischer, Environmental Engineer
2. Constantinos Loukeris, Environmental Engineer

**Other Attendees:**

1. Leslie Gearhart, Pin Oak, Regulatory Compliance Manager
2. Joseph Baker, Pin Oak, Technician
3. Jake L., Pin Oak, Technician

**Contact Email Address:** Leslie.Gearhart@pinoakep.com

**Purpose of Inspection:** To assess compliance with requirements of New Source Performance Standards (NSPS) Subparts OOOO and OOOOa and facility permit to install and operate (PTIO)

**Facility Type:** oil and natural gas well pad

**Regulations Central to Inspection:** NSPS Subparts OOOO and OOOOa

**Arrival Time:** 2:30 PM EST

**Departure Time:** 2:55 PM EST

**Inspection Type:**

- ☐ Unannounced Inspection
- ☒ Announced Inspection

**OPENING CONFERENCE**

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Small Business Resource Information Sheet not provided. Reason: Not a small business.
- ☒ Provided CBI warning to facility

The following information was obtained verbally from facility personnel unless otherwise noted.

**Process Description:**

Pin Oak personnel indicated that it purchased all the Ohio well pads approximately two years ago (2020). The Kamm well pad was originally owned by Chevron and started up in the 2012-2013 timeframe.

At the well pad, an oil/gas/water emulsion is extracted from the formation through wells on-site. The emulsion from each well goes to a separator, from which the gas is sent to the sales line and the oil and water are piped to separate atmospheric pressure, fixed-roof tanks on-site. The vapors from the tank headspaces are piped together and to one atmospheric stack. Each tank has a “thief” hatch on top for gaining access to the liquid when necessary. The thief hatches are set to relieve pressure should the pressure due to flashing, working, or breathing emissions from the liquids contained within the tanks get too high for the piping of the vapor capture system and combustor to accommodate. In addition to the thief hatch, each tank has a pressure relief valve that vents to atmosphere upon release.

**Staff Interview:** The Clark well pad has two wells and twelve tanks.

**TOUR INFORMATION**

**EPA Tour of the Facility:** Yes

**Data Collected and Observations:**

We climbed the tank battery and viewed the thief hatches and pressure relief devices with a FLIR® GF-320 camera (FLIR® camera). We observed hydrocarbon emissions with the FLIR® camera from pressure relief devices and thief hatches being used the facility. Odors were noticeable when imaging the tanks. In addition, Pin Oak indicated that the pneumatic controllers are low bleed. When Pin Oak purchased this well pad, two vapor recovery compressors were on the well pad but not in use. These compressors have not been decommissioned.

**Photos and/or Videos:** were taken during the inspection.

**Field Measurements:** were not taken during this inspection.

### **CLOSING CONFERENCE**

☒ Provided U.S. EPA point of contact to the facility

### **Requested documents:**

We requested the following documents, and summarized via e-mail on October 20, 2022:

- Permits for each well pad inspected;
- Past two years of annual optical gas imaging survey results conducted by Pin Oak;
- Past two years of monthly visuals conducted by Pin Oak;
- Replacements of seals associated with past two years of inspections by Pin Oak;
- Potential-to-emit calculations for each of the well pads inspected and any updated calculations (if applicable);
- Tank levels at the time of our inspection for each tank and each well pad inspected;
- Tank contents by tank number;
- Well pad names and identification numbers, and include which wells were active during our inspection;
- Pressure setpoints for each thief hatch and pressure relief valve by tank and well pad;
- Any repairs made as a result of our inspection.

**Concerns:** Where we detected emissions with the FLIR<sup>®</sup> camera, we shared our observations with Pin Oak personnel, so the leak points could be tagged for repair.

### **DIGITAL SIGNATURES**

Report Author: \_\_\_\_\_

Section Supervisor: \_\_\_\_\_

**Facility Name:** Pin Oak Energy Partners (Pin Oak) – Clark Well Pad

**Facility Location:** Valley, Ohio

**Date of Inspection:** August 30, 2022

**APPENDICES AND ATTACHMENTS**

1. Digital image/video log

**Facility Name:** Pin Oak Energy Partners (Pin Oak) – Clark Well Pad

**Facility Location:** Valley, Ohio

**Date of Inspection:** August 30, 2022

**APPENDIX A: DIGITAL IMAGE LOG**

<b>1. Inspector Name:</b> Constantinos Loukeris	<b>2. Archival Record Location:</b> OneDrive
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<b>Image Number</b>	<b>File Name</b>	<b>Date and Time (incl. Time zone and DST)</b>	<b>Description of Image</b>
1	MOV_0511.mp4	2:34 PM EST	VOC emissions imaged from a thief hatch on Tank #41.
2	MOV_0512.mp4	2:34 PM EST	VOC emissions imaged from a pressure relief device and thief hatch on Tank #39.
3	MOV_0513.mp4	2:35 PM EST	VOC emissions imaged from a pressure relief device on Tank #40.
4	MOV_0514.mp4	2:36 PM EST	VOC emissions imaged from a thief hatch on Tank #38.
5	MOV_0515.mp4	2:37 PM EST	VOC emissions imaged from a thief hatch on Tank #37. Odors were noticeable.
6	MOV_0516.mp4	2:38 PM EST	VOC emissions imaged from a pressure relief device on Tank #35. Odors were noticeable.
7	MOV_0517.mp4	2:39 PM EST	VOC emissions imaged from a thief hatch on Tank #34. Odors were noticeable.
8	MOV_0518.mp4	2:40 PM EST	VOC emissions imaged from a thief hatch and pressure relief device on Tank # 36. Odors were notice.
9	MOV_0519.mp4	2:40 PM EST	VOC emissions imaged from a thief hatch and pressure relief device on Tank #32 (1).
10	MOV_0520.mp4	2:41 PM EST	VOC emissions imaged from a pressure relief device on Tank #30 (3).
11	MOV_0521.mp4	2:42 PM EST	VOC emissions imaged from a thief hatch on Tank #31.